

MILLIMAN, INC., MILLIMAN
SOLUTIONS, LLC, and VIGILYTICS
LLC,

Plaintiffs,

vs.

GRADIENT A.I. CORP., STANFORD A.
SMITH, and SAMUEL CHASE PETTUS,

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

As grounds for this motion, Plaintiffs submit that Defendants have marked certain information contained in the Memorandum and accompanying exhibits as confidential and not publicly known. Exhibit A contains information that Defendants contend is confidential and not publicly known; specifically, it contains excerpts from Defendants' documents that are marked "CONFIDENTIAL ATTORNEYS' EYES ONLY" pursuant to the Protective Order enter in this case. A redacted version of this exhibit will be publicly filed. Exhibits B–G are documents that Defendants produced to Plaintiffs marked "CONFIDENTIAL ATTORNEYS' EYES ONLY" pursuant to the Protective Order entered in this case, and will be filed under seal:

GRADIENT00000647 (Exhibit B), GRADIENT00000649 (Exhibit C), GRADIENT00000650 (Exhibit D), GRADIENT00000651 (Exhibit E), GRADIENT00000652 (Exhibit F), GRADIENT00000667 (Exhibit G).

Plaintiffs submit the material should be filed under seal, and should remain under seal until returned to Milliman or further order of the Court.

WHEREFORE, for the reasons set forth above, Plaintiffs respectfully request that the Court grant this motion to allow Plaintiffs' Memorandum in Support of Their Motion to Compel Compliance With The Court's Automatic Patent Disclosures, and the above-identified exhibits attached thereto, to be filed under seal and remain sealed until further order of the Court.

Dated: September 16, 2022

Respectfully submitted,

/s/ Christopher Centurelli

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Christopher Centurelli

CERTIFICATE OF CONFERENCE

I hereby certify that, prior to filing this motion, counsel for the parties conferred via email on September 16, 2022 in a good-faith attempt to resolve the matters contained in this motion. Counsel for Defendants stated that they assent to Plaintiffs' request to file these materials under seal.

/s/ Christopher Centurelli